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6 *Attorney for Plaintiff*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 KIM BIRON, an individual,

11 Plaintiff,

12 vs.

13 WYNDHAM VACATIONS OWNERSHIP, INC.,
14 doing business as a foreign corporation,

15 Defendants.

CASE NO: 2:19-cv-01695-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT
(First Request)**

16 COMES NOW, Plaintiff, KIM BIRON, ("Plaintiff"), by and through her counsel, the law
17 firm of Hatfield & Associates, Ltd., and Defendant WYNDHAMVACATIONS OWNERSHIP,
18 INC. ("Defendant") by and through its counsel, Amy L. Thompson, Esq., of the law firm of Littler
19 Mendelson, P.C., hereby stipulate and agree to extend the time for Plaintiff to Respond to
20 Defendant's Motion for Summary Judgment (ECF #49). This request is submitted pursuant to LR
21 IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the parties' first request for an extension of time for
22 Plaintiff to respond to Defendant's Motion for Summary Judgment.
23

24 Good cause exists for this extension, Plaintiff's counsel's paralegal has been out of the
25 office on leave due to needing to care for a family member, which has caused a backflow of work.
26 Additionally, Plaintiff's counsel will need to confer with his client regarding the facts of the
27 attendant motion and his client has not been available to do so.
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2 Accordingly, Plaintiff shall have up to and including June 1, 2021, to respond to
3 Defendant's Motion for Summary Judgment (ECF #49). Defendant's reply to Plaintiff's response
4 will be extended to June 29, 2021.

5 Dated this 23rd day of April, 2021

Dated this 23rd day of April, 2021

6 **HATFIELD & ASSOCIATES**

LITTLER MENDELSON, P.C.

7 */s/ Trevor J. Hatfield*

/s/ Amy L. Thompson

8 By: _____
9 Trevor J. Hatfield, Esq. (SBN 7373)
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14 *Attorney for Plaintiff*

By: _____
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Attorneys for Defendant

15 **IT IS SO ORDERED:**

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17 _____
18 **RICHARD E. BOULWARE, II**
19 **United States District Court**

20 DATED this 28th day of April, 2021.

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Certificate of Service

I certify that on the 23rd day of April, 2021 electronically filed **STIPULATION AND ORDER FOR TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT (First Request)** with the Clerk of the Court using the ECF system which served the parties hereto electronically.

Dated this 23rd day of April, 2021

HATFIELD & ASSOCIATES, LTD.

By: /s/ Freda P. Brazier
An employee of Hatfield & Associates, Ltd.